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SME: Scott Payne	Writer: Joyce Netter	

Level 2 Administrative Procedure

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1.0 PURPOSE

- 1.1 This procedure provides guidance to personnel employed by or contracted to Fluor-BWXT Portsmouth LLC (FBP) at Portsmouth Gaseous Diffusion Plant (PORTS) that handle, store or stage Comprehensive, Environmental Response, Compensation, and Liability (CERCLA) waste generated under the *Record of Decision (ROD) for the Process Buildings and Complex Facilities* (FBP-ER-RIFS-BG-RPT-0037), *Record of Decision (ROD) for the Site-Wide Waste Disposition Evaluation Project* (FBP-ER-RIFS-WD-RPT-0041), *Comprehensive Deactivation, Demolition and Disposition Remedial Design/Remedial Action (RD/RA) Work Plan (WP)* (FBP-ER-RDRA-BG-PLN-0075), *Deactivation of non-time Critical Buildings and Structures Remedial Action (RA) Work Plan (WP)* (FBP-ER-EECA-BG-PLN-0056), or any waste generated during activities that support work activities covered in these documents. Waste types include; Low Level Waste (LLW), Used Oil, Polychlorinated Biphenyl's (PCB), Hazardous, Mixed (Hazardous/LLW) Universal, and Recyclable.
- 1.2 This document implements applicable regulatory requirements. They are listed in Appendix A, *Regulatory Requirements Flow Down*.

2.0 SCOPE AND APPLICABILITY

- 2.1 This Level 2 procedure applies to personnel employed by or contracted to Fluor-BWXT Portsmouth LLC (FBP) who handle, store or stage LLW, Used Oil, PCB, Hazardous, Mixed, Universal or Recyclable waste generated under a CERCLA activity.
- 2.2 This procedure does not apply to waste stored in the Satellite Accumulation Areas (SAA), RCRA Central Accumulation Areas (CAA), and RCRA Part B permitted storage or wastes generated outside of the CERCLA designated activities.
- 2.3 This procedure does not apply to outdoor waste placed in piles outdoors during demolition or excavation activities.

3.0 GENERAL INFORMATION

- 3.1 U.S. Department of Energy (DOE) Order 435.1, *Radioactive Waste Management* describes the requirements for the handling and storage of radioactive waste on DOE sites.
- 3.2 CERCLA is a Congressional act that provides a systematic approach to addressing legacy environmental concerns. Work is authorized under RD/RA documentation which specifies Applicable or Relevant and Appropriate Requirements (ARARs) must be applied to the management of waste generated under CERCLA activities. These ARARs include storage and staging requirements reflected in this procedure.

4.0 USE REFERENCES

- A. FBP-BS-PRO-00062, *Records Management Process*
- B. FBP-NO-PRO-00101, *Facility Inventory Control*
- C. FBP-NSE-PRO-00089, *Response to Nuclear Criticality Safety (NCS) Anomalous Conditions*

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- D.** FBP-WM-PRO-00016, *Spill Cleanup and Repackaging/Transferring Waste*
- E.** FBP-WM-PRO-00046, *Wastes/Recyclables Tracking*
- F.** FBP-WM-PRO-00295, *Waste Container Labeling and Marking Requirements for Storage*
- G.** FBP-WM-PRO-00329, *Waste Generation Under Activities Governed by Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)*

5.0 RESPONSIBILITIES

5.1 Nuclear Criticality Safety (NCS) and Nuclear Safety

- 5.1.1** When requested, works with Facility Manager (FM) to establish the proper NCS controls and other facility safety controls to ensure safe waste storage within an area.
- 5.1.2** Nuclear Safety evaluates CERCLA Storage and Staging areas under the Unreviewed Safety Question (USQ) process prior to placement of waste.
- 5.1.3** NCS responds to anomalous conditions in accordance with FBP-NSE-PRO-00089, *Response to Nuclear Criticality Safety (NCS) Anomalous Conditions*.

5.2 Radiation Protection (RP)

When requested, works with the FM to establish the proper radiological controls and documentation for radioactive waste storage for wastes generated under CERCLA.

5.3 Facility Manager (FM)

- 5.3.1** Has authority for determining acceptable CERCLA waste areas and any additional waste storage requirements that apply within their facility.
- 5.3.2** Ensures evaluation of storage and staging areas by Nuclear Safety using the USQ process prior to the placement of waste. Ensures Environmental Protection performs inspection of new storage areas prior to first waste placement. When necessary, coordinates with the NCS group to ensure that the necessary Nuclear Criticality Safety Evaluation (NCSE) coverage and Criticality Accident Alarm System (CAAS) coverage evaluation has been established prior to storing fissile material.
- 5.3.3** Coordinates with RP group to ensure the proper radiological controls have been established prior to allowing waste into a CERCLA Waste Storage or Staging Areas.
- 5.3.4** Authorizes Project Supervisor or Waste Management (WM) personnel to establish CERCLA Waste Staging areas.
- 5.3.5** Authorizes Waste Operations to construct and mark the designated CERCLA Waste Storage Areas.

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5.3.6 Inspects LLW containers for integrity within their facilities.

5.3.7 Evaluates the Work Control Document (WCD)/Generator Waste Management Plan (GWMP) to ensure all facility specific requirements are documented.

5.4 Waste Disposition Specialist (WDS)

5.4.1 Evaluates the WCD/GWMP to ensure that all waste management requirements are documented.

5.4.2 Evaluates Waste Acceptance Criteria (WAC) compliance with verification from the Waste Acceptance Organization (WAO) prior to demolition, for any waste destined for the On-Site Waste Disposal Facility (OSWDF).

5.4.3 Informs waste generator of the proper waste area for containerized waste.

5.5 Project Manager (PM)/Waste Generation Manager

5.5.1 Oversees the generation of waste through the execution of a defined project.

5.5.2 Ensures that all waste generated is properly managed and has a path for disposal.

5.5.3 Responsible for ensuring project waste staging and storage needs are identified early in the project to allow for planning and approval resources, including but not limited to Nuclear Safety, Security, WM, and RP. This includes designation of waste staging area inspections as required.

5.6 Environmental Protection

5.6.1 Approves all CERCLA Waste Storage Areas used to store hazardous waste, universal waste, used oil or PCB waste prior to placing waste in the area.

5.6.2 Performs periodic oversight reviews to ensure requirements of this procedure are adhered to.

5.7 Waste Associate – Field Services Representative

5.7.1 Facilitates the delivery of containers and labels to the project per the WCD or GWMP.

5.7.2 Conducts and documents CERCLA Waste Staging Area inspections as requested by PM.

5.7.3 Initiates corrective actions for discrepancies noted during the inspection of CERCLA Waste Staging Areas.

5.7.4 Notifies the FM and Environmental Protection when CERCLA Waste Staging Areas are emptied.

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5.8 Waste Operations

- 5.8.1** Confirms all waste accepted within the CERCLA Waste Storage Areas complies with all requirements for acceptance, including those specified by Nuclear Safety.
- 5.8.2** Maintains the inventory of the waste within the CERCLA Waste Storage Area this can be accomplished by using eMWaste FBP-WM-PRO-00046, *Waste/Recyclables Tracking*.
- 5.8.3** Conducts and documents the CERCLA Waste Storage Areas inspections.
- 5.8.4** Initiates corrective actions for discrepancies noted during the inspection of CERCLA Waste Storage Areas.
- 5.8.5** Notifies the FM and Environmental Protection when CERCLA Waste Storage Areas are emptied.

5.9 Project Supervisor

- 5.9.1** Maintains responsibility for the oversight of a given project under CERCLA, which will result in the generation of CERCLA waste.
- 5.9.2** Coordinates with the FM to ensure CERCLA Waste Staging Areas have been evaluated by Nuclear Safety using the USQ process prior to placement of waste.
- 5.9.3** Ensures Waste Management controls regarding containerization, labeling and storage requirements are recorded in the WCD or procedure and work adheres to those requirements.
- 5.9.4** Maintains waste containers at the CERCLA Waste Staging Area until shipment from facility (either to another on-site facility, the OSWDF or off-site) or transfers to the CERCLA Waste Storage Area.
- 5.9.5** Ensures all waste placed in the CERCLA Waste Storage Areas are captured within the eMWaste tracking system using FBP-WM-PRO-00046, *Waste/Recyclables Tracking*

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6.0 ACTIONS

NOTE

Low level radioactive waste generated and containerized as a result of deactivation activities in the process buildings are not required to be stored in designated CERCLA staging or storage areas; however all RP and NCS and Nuclear Materials Control and Accountability (NMC&A) requirements apply and must comply with DOE O 435.1, *Radioactive Waste Management*. The FM has the authority to require additional waste management controls not directed by this procedure. There requirements documented in the WCD/GWMP. LLW containers are marked in accordance with FBP-WM-PRO-00329, *Waste Generation Under Activities Governed by Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)*.

NOTE

Waste containers in CERCLA areas are not required to have a Tamper Indicating Device (TID) installed. However, waste containers may have a TID installed by various groups to prove compliance with specific requirements. Examples include, but are not limited to; TID a container after sampling to prove no new waste has been added, a waste package certifier TID placed to prove compliance with NNSS requirements, etc.

6.1 Establishing and Operating CERCLA Waste Staging Areas

NOTE

A CERCLA Waste Staging Area is an identified area generally in the vicinity which waste is being collected and containerized prior to movement to offsite disposal or a CERCLA storage area. However, if necessary because of building constraints, a Staging Area may be located in central areas not necessarily by where the activity is taking place. The FM must approve the location of these areas. The Project Supervisor shall ensure the specific waste handling requirements as specified in WCD/GWMP along with other controls as required, are included in the WCD or procedure.

NOTE

Establishment of CERCLA Interim Waste Areas (IWAs) can be approved by the FM for temporary staging of waste for up to 7 days. If CERCLA Staging Area approval as is not obtained, the waste must be moved to an approved CERCLA Staging or Storage Area.

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WDS

- 6.1.1** Ensure WM controls are incorporated into the WCD/GWMP or procedure which includes, but is not limited to:
- Container type
 - Marking and Labeling
 - Required segregation of container
- 6.1.2** Review and approve the WCD(s) or procedures to ensure all pertinent WM requirements are clearly incorporated.

FM

- 6.1.3** Approve the placement of CERCLA Waste Staging Areas and any additional facility specific requirements.
- 6.1.4** Request Nuclear Safety to evaluate the new CERCLA Waste Staging Area prior to placement of any waste using the USQ process. Areas previously used for storage as 90-day or permitted storage or Radioactive Waste Areas already approved do not require an additional approval or Unreviewed Safety Question Determination (USQD) screening when re-designated as CERCLA.

Project Supervisor/Field Representative or Designee

- 6.1.5** Ensure CERCLA Waste Staging Area has been evaluated by Nuclear Safety using the USQ process.
- 6.1.6** Ensure CERCLA Waste Staging Area, as approved by the FM, are posted as CERCLA Staging Area with the waste type (e.g., used oil, Hazardous waste, PCB waste, universal waste) as in the WCD/GWMP or procedure.
- 6.1.7** Perform inspections in accordance with Subsection 6.3, *Inspection Frequency and Guidance*.
- 6.1.8** Ensure waste containers are filled in accordance with FBP-WM-PRO-00329, and with specific requirements as specified in the WCD/GWMP or procedure in regards to container types and labeling.

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6.1.9 Ensure all Hazardous Waste is transferred from the CERCLA Waste Staging Area either off-site or to a CERCLA Waste Storage Area within seven days of generation (defined as the date the first piece of waste is placed into the container).

- **IF** the transfer cannot occur by that date, **THEN** the project is responsible for providing secondary containment for all liquid waste with at least 10% of the total volume stored or 100% of the largest container whichever is greater. In addition, adequate fire suppression, spill response equipment, appropriate aisle space to allow for inspections, and Personal Protective Equipment (PPE) appropriate to waste type will be provided for solid and liquid waste. Inspections will be performed and documented in accordance with Subsection 6.3 and the appropriate Attachments of this procedure.

NOTE

PCB transformers that have been declared waste in the X-330 and X-333 should be inspected using FBP-WM-PRO-00330-F06. These large transformers are exempt from storage/staging area requirements.

6.1.10 Complete required inspections in accordance with FBP-WM-PRO-00330-F06, *Greater Than Or Equal To 50 Parts Per Million (Ppm) Polychlorinated Biphenyl (PCB) Inspection Record*.

6.1.11 Ensure all PCB Waste is transferred from the CERCLA Waste Staging Area either off-site or to a CERCLA Waste Storage Area within thirty days of generation.

- **IF** transfer cannot occur by that date, **THEN** the project is responsible for completing and documenting inspections for the waste in accordance with Subsection 6.3. In addition, the project is responsible for providing secondary containment for all liquid PCB waste.

6.1.12 Complete required inspections in accordance with FBP-WM-PRO-00330-F02, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Waste Staging Area Inspection Checklist*.

6.1.13 Notify FM when a CERCLA Waste Staging Area is emptied and no longer needed.

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6.2 Establishment, Management, and Inspection of CERCLA Waste Storage Areas

WARNING

CERCLA Waste Storage Areas must be approved by Nuclear Safety through the USQ process prior to placement of waste. CERCLA Waste Storage Areas holding Fissile Material must adhere to all specified NCSE requirements. If an NCS requirement appears to have been compromised, initiate the actions for an anomalous condition in accordance with FBP-NSE-PRO-00089.

NOTE

CERCLA Waste Storage Areas are collection points for wastes from many various projects executed as part of a CERCLA clean-up action. The use of CERCLA Waste Storage Areas allows for consolidation of inventories to ensure the most cost-effective and safe handling of waste. CERCLA Waste Storage Areas are managed by Waste Operations.

The segregation requirements identified in Appendix B, *RCRA's Chemical Waste Compatibility List*, apply to CERCLA Waste Storage Areas.

FM

- 6.2.1 Notify Emergency Response organization of all CERCLA Waste Storage Areas and types of wastes stored in facilities.
- 6.2.2 Obtain approval from Nuclear Safety through the USQ process for any newly established CERCLA storage area. Areas previously used for storage as 90-day or permitted storage or Radioactive Waste already approved do not require an additional approval when re-designated as CERCLA.
- 6.2.3 Ensure additional radiological and/or NCS requirements are addressed prior to allowing placement of waste within the area.

Waste Operations

- 6.2.4 Ensure all approachable sides of the area are posted as "CERCLA Waste Storage Area." Waste types must be segregated with signage designating waste type.
- 6.2.5 Ensure the area is in good repair with no leaks into the area and no drains or major cracks for material escape in the event of a leak from a container.
- 6.2.6 Perform inspections as required in accordance with Subsection 6.3.
- 6.2.7 Complete required inspections in accordance with FBP-WM-PRO-00330-F01, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Storage Area Inspection Checklist*.

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6.2.8 Additional criteria for CERCLA Waste Storage Areas housing Hazardous waste include:

- A.** Ensure areas to be used for the storage for liquid hazardous waste have some means of secondary containment (e.g., spill pallet, diking). The secondary containment must have the capacity to hold approximately 10 percent of the total liquid volume or 100 percent of the volume for the largest container, whichever is largest and the container is resistive to the waste stored.
- B.** Areas must have adequate fire suppression water immediately available to the facility through installed sprinklers and/or nearby fire hydrants.
- C.** The facility access will be maintained to allow adequate ingress/egress in the event of an emergency.
- D.** Adequate aisle space between stored containers to allow for inspection and adequate emergency response. A minimum aisle space of 28 inches is required between palletized waste.
- E.** Incompatible waste must be separate by a physical barrier such as a berm or stored on separate spill pallets that are themselves separated by at least one aisle space.
- F.** Ensure the following are staged at the CERCLA Waste Storage Areas:
 - 1) Spill control supplies and PPE appropriate for the type of waste to be stored in the area
 - 2) For areas containing ignitable, flammable, or other highly reactive materials, fire response equipment (e.g., fire extinguishers) appropriate for the waste and the area is posted with signs indicating that no smoking or open flames allowed in the area
 - 3) A means of immediate communication (e.g., phone or radio)
 - 4) Emergency shower
 - 5) A logbook with a current inventory or proper container movement sheets completed to allow the eMWaste® tracking system to serve as the area inventory.

6.2.9 Additional criteria for CERCLA Waste Storage Areas housing asbestos waste include:

- A.** Asbestos abatement requires specific training and packaging requirements as defined in FBP-IH-PRO-00036; *Asbestos Control*. The asbestos regulations are written for the asbestos abatement team to compliantly package the waste for storage and shipment. If additional hazards are present (e.g., LLW, TSCA, etc.) refer to those applicable sections and apply handling, staging and storage requirements of that section.

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- B.** Regulated asbestos waste must be wetted and contained in a container or wrapping that will prevent asbestos fibers from entering the atmosphere.
- C.** Non-Regulated asbestos waste (Category I non-friable asbestos containing material (ACM) and Category II nonfriable ACM) follow the storage requirements determined by the abatement team, Safety/IH and the WDS on the project.

6.2.10 Additional criteria for CERCLA Waste Storage Areas housing TSCA waste include:

- A.** Floor must be impervious and free of deterioration or damage. The area must have adequate walls and roofing to prevent in-leakage from rain and/or surface water sources.
- B.** Ensure area to be used for the storage of liquid PCB waste have a means of secondary containment. If curb or diking is used, then the curb/dike height must be a minimum of six inches. Spill pallets are also an option if the liquid waste can be stored on one. Regardless of dike or curbing height, the containment system must be able to accommodate at least two times the internal volume of the largest PCB article/container or 25 percent of the total internal volume of all PCB articles/containers whichever is largest.
- C.** Ensure storage area is posted with a yellow greater than 50 ppm PCB label.

6.2.11 Additional criteria for CERCLA universal waste:

- A.** Ensure containers are structurally sound and properly labeled.
- B.** Ensure universal waste is segregated properly by type and compatibility.

6.2.12 Additional criteria for CERCLA additional used oil storage area:

- A.** Ensure all used oil containers are stored within secondary containment (diked area or on spill pallets) that is capable of containing 100% of the largest used oil container.
- B.** Ensure that an adequate spill control kit is present.

6.3 Inspection Frequency and Guidance

Waste Operations/Field Representatives/Project Personnel

6.3.1 Complete Inspections per the following frequency:

- 1) Waste areas housing RCRA waste – every 7 days
- 2) Waste areas housing TSCA PCB waste – every 30 days
- 3) Waste areas housing used oil waste – every 30 days
- 4) Waste areas housing universal waste – every 7 days

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6.3.2 IF any items on FBP-WM-PRO-00330-F01 are checked ‘NO’, THEN document the details of the condition in Section 2 of the checklist and notify the FM/Project Manager and supervisor responsible for the area.

6.3.3 IF the non-compliant item involves a spill or a bulging container, THEN immediate action is required. Consult FBP-WM-PRO-00016, *Spill Cleanup and Repackaging/Transferring Waste*.

6.3.4 For other non-compliances, the following consultations may be required:

- 1) Supervisor for issues with trash, debris or obstructions, spill kits, damaged containers.
- 2) FM for issues with in-leakages from facility leaks.
- 3) Check any open items from previous inspections to determine if corrective actions have been completed.
- 4) **WHEN** inspection checklist discrepancy is corrected, **THEN** record the actions taken, status, and verification on the inspection checklist.
- 5) Ensure completed inspection checklists are collected by the cognizant Waste Operations Supervisor or designee who will maintain in accordance with FBP-BS-PRO-00062, *Records Management Process*.

6.3.5 Guidelines for Closing a CERCLA Storage Area:

- A.** Notify FM when a CERCLA storage area is emptied of all waste containers and is no longer required.
- B.** Notify Environmental Protection of potential storage area closure. Environmental Protection will conduct area inspection to ensure area meets requirements of this procedure identified in FBP-WM-PRO-00330-F01.

NOTE

It may be necessary or prudent to maintain a non-containerized LLW pile meeting the WAC for OSWDF disposal within a facility undergoing deactivation. The following provides guidance and requirements about maintaining inventories of LLW.

6.4 Low Level Radioactive Waste (LLW) Accumulation Pile

Facility Manager

- 6.4.1** Identify area for accumulation of non-containerized LLW meeting OSWDF WAC.
- 6.4.2** Identify each area as an LLW accumulation waste pile.
- 6.4.3** Ensures all NCS and NMC&A requirements are met.

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6.4.4 Ensure boundaries of an LLW accumulation pile are established and marked.

Waste Management

6.4.5 Ensure each area is posted in accordance with the Radiological Protection instructions. (For example, Radioactive Material Area).

6.4.6 Non-containerized waste does not have to be tracked by WMG (but may be tracked at the discretion of Waste Management, FM, or the Project).

6.4.7 Inspect LLW accumulation waste piles every 30 days in accordance with FBP-WM-PRO-00330-F03, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Low Level Waste Accumulation Pile Checklist*.

6.5 Low Level Radioactive Waste (LLW) Containerized Waste

6.5.1 General Requirements for LLW Containers:

- A.** IF required, THEN ensure containers are in the proper radiological control areas.
- B.** Containers used to store waste shall be in good condition and compatible with the materials being placed in them. Keep containers within these areas closed except when adding, removing, inspecting or sampling waste.
- C.** All containers shall be marked to indicate their contents.
- D.** Ensure that any container has an eMWaste barcode tracking waste identification number.
- E.** Adequate space between containers exists to allow for inspection.
- F.** IF an NCS requirement appears to have been compromised, THEN initiate the actions for an anomalous condition in accordance with FBP-NSE-PRO-00089.
- G.** LLW containerized waste stored inside shall be inspected at a minimum of every 180 days.
- H.** LLW containerized waste stored outside shall be inspected at a minimum of once every calendar month.

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Facility Manager

6.5.2 Performance of Monthly Inspection of LLW containerized waste:

- A.** Complete inspection in accordance with FBP-WM-PRO-00330-F07, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Containerized Low Level Waste (LLW) Checklist*.
- B.** **IF** any items on the inspection checklist are abnormal, **THEN** document the details of the condition in the checklist discrepancies section.
- C.** Check any open items from previous inspections to determine if corrective actions have been completed.
- D.** Identify any discrepancies and notify the WDS within 24 hours of the discovery.
- E.** Initiate corrective actions within 24 hours of problem identification.
- F.** **WHEN** inspection checklist discrepancy is corrected, **THEN** record the actions taken, status, and verification on the inspection checklist.
- G.** Ensure completed inspection checklists are maintained in accordance with FBP-BS-PRO-00062, *Records Management Process*.

NOTE

Legacy bulk waste accumulation (non-containerized excess materials) areas are established at X-743, X-750, X-720, and X-530.

Other areas may be established with the approval of Facility Manager and Waste Management.

Waste Management will maintain a current list of bulk waste storage areas.

6.6 Bulk Waste Accumulation Areas

Facility Manager

- 6.6.1** Identify location for bulk waste collection areas (LLW).
- 6.6.2** Establish collection area boundaries and ensure each area is marked as "Bulk Waste (LLW) Collection Area."
- 6.6.3** Confirm bulk wastes are solids/LLW.
- 6.6.4** Ensure accumulated bulk waste is radiologically characterized and properly characterized prior to adding material to accumulation area.
- 6.6.5** Contact RP to ensure proper radiological controls are followed.

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NOTE

Examples of non-conforming materials: light bulbs, batteries, circuit boards, electronic scrap, asbestos, containerized waste or other suspect materials.

- 6.6.6** Ensure access is controlled to prevent addition of non-conforming materials.

Waste Management

- 6.6.7** Non-containerized waste does not require eMWaste tracking (WMGs).

- 6.6.8** Inspect bulk waste collection areas every 30 days in accordance with FBP-WM-PRO-00330-F04, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Bulk Waste Accumulation Area Checklist*.

6.7 Compacted Bundle Storage Area Inspection

Waste Management

- 6.7.1** General Requirements for the Compacted Bundle Storage Area:

- A.** Ensure personnel working with or in the vicinity of radioactive material within the Bundle Storage Area are adequately trained and qualified prior to entering the designated area.
- B.** Ensure personnel entering the Bundle Storage Area meet the requirements of the area Radiological Work Permit (RWP), if required.
- C.** Ensure containers used to store the bundles are in good condition and compatible with the materials being placed within them. Do not open these containers once in storage.
- D.** Mark all containers to indicate their contents and that the material is LLW.
- E.** Ensure any container placed into the Bundle Storage Area have an eMWaste barcode and the container information has been added to the eMWaste tracking system in accordance with FBP-WM-PRO-00046, *Wastes/Recyclables Tracking*.
- F.** Ensure all containers are marked and labeled in accordance with FBP-WM-PRO-00295, *Waste Container Labeling and Marking Requirements for Storage*.
- G.** Maintain a minimum of 5 feet in all directions between each container.
- H.** Maintain all NCS requirements in areas where fissile material is being stored, in accordance with the applicable NCSE if required.

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- I. **IF** an NCS requirement appears to have been compromised, **THEN** initiate the actions for an anomalous condition in accordance with FBP-NSE-PRO-00089, *Response to Nuclear Criticality Safety (NCS) Anomalous Conditions*.
- J. Inspect the Bundle Storage Area quarterly or once every three (3) months.

Facility Manager

- 6.7.2 Ensure the area within X-747L Pad has been posted/identified as the Compacted Bundle Storage Area.
- 6.7.3 Ensure any Radiological postings necessary are around the area.
- 6.7.4 Ensure containers entering the area meet the requirements of the applicable Technical Safety Requirement (TSR) and Preliminary Hazard Screening (PHS) for the area.
- 6.7.5 Ensure all containers entering the area are approved in accordance with the requirements of FBP-NO-PRO-00101, *Facility Inventory Control*.

Waste Management or Designee

- 6.7.6 Performance of the Quarterly (3 month) Compacted Bundle Storage Area:
 - A. **IF** applicable, **THEN** don any storage area specific PPE required for entry as specified in the RWP associated with storage area.
 - B. Complete the inspection in accordance with FBP-WM-PRO-00330-F05, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Compacted Bundle Container Storage Checklist*.
 - C. **IF** any items on the inspection checklist are marked “NO,” **THEN** document the details of the condition in detail in the comments section of the checklist.
 - D. Check any open items from previous inspections to determine if corrective actions have been completed.
 - E. Notify the Waste Disposition Specialist within 24 hours of any discrepancy(s).
 - F. Initiate corrective action within 24 hours of problem identification.
 - G. **WHEN** inspection checklist discrepancy(s) are corrected, **THEN** record the actions taken, status, and verification on the inspection checklist.
 - H. Convey any discrepancy(s) noted on the physical condition of the storage area and/or the berm to the Facility Manager and Engineering via a Problem Report.

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- I. Ensure completed inspection checklists are maintained in accordance with FBP-BS-PRO-00062.

NOTE

NMC&A shall be notified of activities that change the characteristics of accountable nuclear materials (i.e., weight, volume, assay, etc.)

6.8 Spill Response

Waste Management

- 6.8.1** IF a spill is detected within a Fissile Material Storage Area, **THEN STOP** and initiate the actions for an anomalous condition in accordance with FBP-NSE-PRO-00089.
- 6.8.2** Adhere to the requirements in FBP-WM-PRO-00016.
- 6.8.3** Spills under CERCLA are to be handled as follows:
 - 1) A spill of a hazardous substance of less than 1 gallon is considered an incidental spill:
 - a) Report spill to Supervisor.
 - b) Cleanup all incidental spills in accordance with site procedures and plans.
 - c) Contact WM for assistance with management of waste generated during spill cleanup.
 - 2) A spill of a hazardous substance of greater than 1 gallon, or any spill of hazardous waste regardless of volume (except spills of hazardous waste meeting the definition of a significant spill or release under Step 6.8.3:3), is considered a minor spill:
 - a) Report spill to Plant Shift Superintendent (PSS) and Supervisor.
 - b) Supervisor shall record information on the spilled material including substance spilled, quantity, and location.
 - c) Clean up minor spills in accordance with site procedures and plans.
 - d) Contact WM for assistance with management of waste generated during spill cleanup.
 - e) Obtain Global Positioning System (GPS) coordinates for the spill location if the spill reaches environmental media (e.g., soil). GPS coordinates may be obtained by contacting Environmental Remediation Field Characterization supervision.

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f) Supervisor shall ensure information collected in Step 6.8.3:2b) and 6.8.3:2e) is provided to FBP Environmental Protection.

- 3) A significant spill or release infers there are serious consequences to human health or the environment requiring immediate and coordinated spill response such as:
- A fire that causes the release of toxic fumes
 - A fire that spreads, possibly igniting materials at other locations or causing heat-induced explosions
 - A spill that results in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard
 - A spill that cannot be contained on PORTS, resulting in off-PORTS soil contamination or groundwater or surface water pollution
 - A spill or release into the environment of a petroleum product (e.g., oil, diesel fuel, gasoline) with the potential for impacting streams by causing a sheen, or a significant quantity of oil (i.e., 25 gallons or greater) that has reached or can potentially reach beyond the project boundary
 - Spill or release into the environment of a substance meeting/exceeding a legally Reportable Quantity
 - Take the following actions:
 - a) Leave area of spill or release and alert others when leaving.
 - b) Immediately report spill to Fire Services or the PSS to begin emergency response actions.
 - c) Report spill or release to Supervisor.
 - d) Provide information to responding emergency personnel.
 - e) Immediate response actions will be completed in accordance with site plans and training.
 - f) Ohio Environmental Protection Agency (EPA) shall be promptly informed of any significant spills.
 - g) Clean up spill.
 - h) Notify WM for assistance with managing waste.

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7.0 RECORDS

7.1 Records Generated

- A. FBP-WM-PRO-00330-F01, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Storage Area Inspection Checklist*
- B. FBP-WM-PRO-00330-F02, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Waste Staging Area Inspection Checklist*
- C. FBP-WM-PRO-00330-F03, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Low Level Waste Accumulation Pile Checklist*
- D. FBP-WM-PRO-00330-F04, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Bulk Waste Accumulation Area Checklist*
- E. FBP-WM-PRO-00330-F05, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Compacted Bundle Container Storage Checklist*
- F. FBP-WM-PRO-00330-F06, *Greater Than Or Equal To 50 Parts Per Million (PPM) Polychlorinated Biphenyl (PCB) Inspection Record*
- G. FBP-WM-PRO-00330-F07, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Containerized Low Level Waste Checklist*

7.2 Requirements

Records generated or received as a result of performing this procedure shall be managed according to FBP-BS-PRO-00062, *Records Management Process*.

8.0 DEFINITIONS/ACRONYMS

8.1 Definitions

- A. **Category I nonfriable asbestos-containing material (ACM)**- Asbestos containing packings, gaskets resilient floor covering and asphalt roofing products containing more than 1 percent asbestos as determined using the method specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, *Polarized Light Microscopy*.
- B. **Category II nonfriable asbestos-containing material (ACM)**- any material, excluding Category I nonfriable ACM, containing more than 1 percent asbestos as determined using the methods specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, *Polarized Light Microscopy* that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

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- C. CERCLA Project Waste** – Waste generated from activities identified in an RD/RA WP as approved by the cognizant regulators. Waste is subject to the controls listed as ARARs. Waste may be recycled or disposed.

- D. CERCLA Waste Staging Area** – An identified area in the vicinity which waste is being collected and containerized prior to movement to offsite disposal, the OSWDF or a CERCLA storage area. These areas are under the control of the project generating the waste and must be posted as specified in the WCD, generally as a CERCLA Waste Staging Areas. Containers must be labeled per FBP-WM-PRO-00329 and tracked per FBP-WM-PRO-00046. Limitations on number of containers, volume of waste, or other controls (e.g., spill pallets) must be implemented as specified in the WCDs governing the generating work. These are temporary staging areas and all wastes are to be transferred either off-site, the OSWDF or to a CERCLA Waste Storage Area after the generating operation is complete. Examples include the collection of several drums of oil collected from a draining operation.

- E. CERCLA Waste Storage Area** – An identified area used to consolidate wastes from multiple generating projects. These areas are under the control of WM, registered with Environmental Protection and must be posted as CERCLA Waste Storage Areas. Substantive requirements for construction and required equipment will be specified based on the waste to be held, consistent with the ARARs approved by Ohio EPA. All wastes placed in these areas must be entered into an inventory for tracking. The CERCLA Waste Storage Areas are anticipated to house wastes also governed as RCRA, TSCA, and universal wastes.

- F. Fissile Material** – For the purposes of this procedure, fissile material is:
 - 1) uranium material > 15 grams ²³⁵U enriched to > 1.0 wt.% and fissile metals > 0.93 wt.%;
 - 2) material containing other fissionable radionuclides capable of sustaining a chain reaction in quantities greater than or equal to 1.6 % of their maximum subcritical mass.

- G. Interim Waste Area (IWA)** – an identified area approved by the FM used to collect containerized waste during the CERCLA Waste Staging Area approval process. IWAs can only be established for 7 days; and must be closed or transitioned to a CERCLA Waste Staging Area.

- H. LLW Accumulation Pile** – An identified indoor area where only non-containerized low level radioactive waste can be placed for either a long time or of short duration prior to disposition. Indoor Waste accumulation piles must be verified by WAO to be WAC compliant. Disposition can be either for the On-Site Waste Disposal Facility or to an offsite Treatment Storage and Disposal Facility.

- I. Work Control Document (WCD)** - Work package or technical procedure.

8.2 Acronyms

- A. CERCLA** – Comprehensive Environmental Response, Compensation, and Liability Act of 1980

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- B. FM** – Facility Manager
- C. GPS** – Global Positioning System
- D. IWA** – Interim Waste Area
- E. LLW** – Low Level Radioactive Waste
- F. NCS** – Nuclear Criticality Safety
- G. NCSE** – Nuclear Criticality Safety Evaluation
- H. NMC&A** – Nuclear Materials Control and Accountability
- I. OSWDF** – On-Site Waste Disposal Facility
- J. PCB** – Polychlorinated Biphenyl
- K. PPE** – Personal Protective Equipment
- L. PSS** – Plant Shift Superintendent
- M. RCRA** – Resource Conservation and Recovery Act of 1976
- N. RD/RA** – Remedial Design/Remedial Action
- O. RP** – Radiation Protection
- P. RWP** – Radiological Work Permit
- Q. TID** – Tamper Indicating Device
- R. TSCA** – Toxic Substances Control Act
- S. USQ** – Unreviewed Safety Question
- T. WAC** – Waste Acceptance Criteria
- U. WAO** – Waste Acceptance Organization
- V. WDS** – Waste Disposition Specialist
- W. WM** – Waste Management
- X. WMG** – Waste/Material Generation

9.0 SOURCE REFERENCES

- A.** 40 CFR 261, *Identification and Listing of Hazardous Waste*
- B.** 40 CFR 262, *Standards Applicable to Generators of Hazardous Wastes*

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- C.** 40 CFR 761.65, *Toxic Substances Control Act (TSCA) – Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions: Storage for Disposal*
- D.** DOE Manual 435.1-1, *Radioactive Waste Management Manual*
- E.** DOE Order 435.1, *Radioactive Waste Management*
- F.** FBP-WM-PRO-00042, *Management of Polychlorinated Biphenyls (PCB) Waste*
- G.** FBP-WM-PRO-00254, *Waste Handling*
- H.** FBP-WM-PRO-00264, *Waste Disposition*
- I.** Ohio Administrative Code 3745 Sections 50 through 69, *Management of Hazardous Waste Regulations*
- J.** POEF-010, *Transportation Safety Document for the On-Site Transport of Hazardous Material at the Portsmouth Gaseous Diffusion Plant Piketon, Ohio*
- K.** FBP-ER-RIFS-BG-RPT-0037, *Record of Decision for the Process Buildings and Complex Facilities Decontamination and Decommissioning Evaluation Project at the Portsmouth Gaseous Diffusion Plant*
- L.** FBP-ER-RDRA-BG-PLN-0066, *Remedial Design/Remedial Action Work Plan and Remedial Design for the Process Building Deactivation at the Portsmouth Gaseous Diffusion Plant, Piketon Ohio*
- M.** FBP-ER-RDRA-BG-PLN-075, *Comprehensive Deactivation, Demolition, and Disposition Remedial Design/Remedial Action Word Plan for the Process Buildings and Complex Facilities Remedial Action Project and Remedial Design for Deactivation of Complex Facilities at the Portsmouth Gaseous Diffusion Plant, Piketon, Ohio*
- N.** FBP-ER-RIFS-WD-RPT-0041, *Record of Decision for the Site Wide Waste Disposition Evaluation Project at the Portsmouth Gaseous Diffusion Plant*
- O.** FBP-ER-RIFS-WD-RPT-0056, *Removal Action Work Plan for Deactivation of non-Time Critical Removal Action Buildings and Structures at the Portsmouth Gaseous Diffusion Plant*

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Appendix A **REGULATORY REQUIREMENTS FLOW DOWN**

1. 40 CFR 261, *Identification and Listing of Hazardous Waste*
2. 40 CFR 262, *Standards Applicable to Generators of Hazardous Wastes*
3. 40 CFR 761.65, *Toxic Substances Control Act (TSCA) – Polychlorinated Biphenyls (PCBs)*
Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions: Storage for Disposal
4. 40 CFR 61 Subpart M, *National Emission Standard for Asbestos*
5. DOE Order 435.1, *Radioactive Waste Management*
6. DOE Manual 435.1-1, *Radioactive Waste Management Manual*
7. Ohio Administrative Code (OAC) 3745 Sections 50 through 69, *Management of Hazardous Waste Regulations*

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Appendix B RCRA'S CHEMICAL WASTE COMPATIBILITY LIST

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RCRA's Chemical Waste Compatibility List

The mixing of Group A materials with Group B materials may have the potential consequences noted.

Group 1-A	Group 1-B
Acetylene sludge	Acid sludge
Alkaline caustic liquids	Acid and water
Alkaline cleaner	Battery acid
Alkaline corrosive liquids	Chemical cleaners
Alkaline corrosive battery fluid	Electrolyte, acid
Caustic wastewater	Etching acid liquid or solvent
Lime sludge and other corrosive alkalis	Pickling liquor & other corrosive acids
Lime wastewater	Spent acid
Lime and water	Spent mixed acid
Spent caustic	Spent sulfuric acid

Potential consequences: Heat generation; violent reaction

Group 2-A	Group 2-B
Aluminum	Any waste in Group 1-A or 1-B
Beryllium	
Calcium	
Lithium	
Magnesium	
Potassium	
sodium	
Zinc powder	
Other reactive metals and metal hydroxides	

Potential consequences: Fire or explosion; generation of flammable hydrogen gas

Group 3-A	Group 3-B
Alcohols	Any concentrated waste in Groups 1A or 1B
Water	Calcium
	Lithium
	Metal hydrides
	Potassium
	SO ₂ Cl ₂ , SOCl ₂ , PCl ₃ , CH ₃ SiCl ₃
	Other water-reactive waste

Potential consequences: Fire, explosion, or heat generation; generation of flammable or toxic gases

Group 4-A	Group 4-B
Alcohols	Concentrated Group 1-A or 1-B wastes
Aldehydes	Group 2-A wastes
Halogenated hydrocarbons	
Nitrated hydrocarbons	
Unsaturated hydrocarbons	
Other reactive organic compounds & solvents	

Potential consequences: Fire, explosion, or violent reaction

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Appendix B
RCRA'S CHEMICAL WASTE COMPATIBILITY LIST
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Group 5-A	Group 5-B
Spent cyanide and sulfide solutions	Group 1-B wastes
Potential consequences: Generation of toxic hydrogen cyanide or hydrogen sulfide gas	
Group 6-A	Group 6-B
Chlorates	Acetic acid and other organic acids
Chlorine	Concentrated mineral acids
Chlorites	Group 2-A wastes
Chromic acid	Group 5-A wastes
Hypochlorites	Other flammable and combustible wastes
Nitrates	
Nitric acid, fuming	
Perchlorates	
Permanganates	
Peroxides	
Other strong oxidizers	
Potential consequences: Fire, explosion, or violent reaction	

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Attachment A
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT (CERCLA) STORAGE AREA INSPECTION CHECKLIST
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COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY
ACT(CERCLA) STORAGE AREA INSPECTION CHECKLIST

Storage Location:	Date:
Inspector Name and Badge Number (Print/Sign):	
Section 1A: PCB Storage Inspection Items	Yes No N/A
1A1. All approachable sides of CERCLA PCB Storage Areas including the yellow/black PCB Label are posted?	
1A2. Storage Area free of trash and debris and walkways free from obstructions?	
1A3. Storage Area free from any spills on the floor or containers?	
1A4. Storage Area free from any in-leakage?	
1A5. Spill Control Kit available and fully stocked for areas holding liquids?	
1A6. Are all liquid containers either stored within 6" diked area OR on spill pallets? Containment system must accommodate 25% of total internal volume of all PCB articles or container.	
1A7. Are spill pallets/ diking in good condition and free from damage?	
1A8. Are containers free from rust/dents/other defects that may compromise integrity?	
1A9. Are all containers free from any signs of pressurization (e.g., bulging, deformations)?	
1A10. Are all containers labeled PCB?	

Any block checked 'NO', Complete Section 2

Section 1B: RCRA Hazardous Waste Storage Inspection Items	Yes No N/A
1B1. All approachable sides of CERCLA Hazardous Waste Storage Areas are posted?	
1B2. Storage Area free of trash and debris and walkways free from obstructions?	
1B3. Storage Area free from any spills on the floor or containers?	
1B4. Storage Area floor free from cracks or other defects that could allow infiltration?	
1B5. Spill Control Kit available and fully stocked for areas holding liquids?	
1B6. Fire extinguisher inspections current? (required only for ignitable, flammable or highly reactive material)	
1B7. Are all liquid containers either stored within 6" diked area OR on spill pallets? Containment system must accommodate 100% of volume for the largest container.	
1B8. Are spill pallets/ diking in good condition and free from damage?	
1B9. Are containers free from rust/dents/other defects that may compromise integrity?	
1B10. Are all containers free from any signs of pressurization (e.g., bulging, deformations)?	
1B11. All containers have required and completed labeling.	
1B12. All Incompatible waste is separated by a physical barrier (e.g., berm or separate spill pallet)?	

Any block checked 'NO', Complete Section 2

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COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY
ACT(CERCLA) STORAGE AREA INSPECTION CHECKLIST

Section 1C: CERCLA Used Oil Storage Inspection Items	Yes	No	N/A
1C1. All approachable sides of CERCLA Used Oil Storage Areas are posted?			
1C2. Storage Area free of trash and debris and walkways free from obstructions?			
1C3. Storage Area free from any spills on the floor or containers?			
1C4. Storage Area floor free from cracks or other defects that could allow infiltration?			
1C5. Spill Control Kit available and fully stocked?			
1C6. Fire extinguisher present and inspection current?			
1C7. Are all liquid containers either stored within 6" diked area OR on spill pallets?			
1C8. Are spill pallets/ diking in good condition and free from damage?			
1C9. Are containers free from rust/dents/other defects that may compromise integrity?			
1C10. Are all containers free from any signs of pressurization (e.g., bulging, deformations)?			
1C11. Are all containers with completed contents label and Used Oil label?			
1C12. Are all containers closed when not being filled?			

Any block checked 'NO', Complete Section 2

Section 1D: CERCLA Universal Waste Inspection Items	Yes	No	N/A
1D1. Universal Waste Accumulation Storage Areas are properly identified with signage on all approachable sides?			
1D2. All Universal Waste containers are properly labeled or marked to identify the type of Universal Waste?			
1D3. All Universal Waste or Universal Waste containers are clearly marked with the accumulation start date?			
1D5. All Universal Waste containers structurally sound?			
1D6. All Universal Waste containers are closed?			
1D7. All Universal Waste containers are compatible with waste they contain?			
1D8. No Universal Waste or Universal Waste containers show signs of leakage or deterioration?			
1D9. Are all liquid containers either stored within 6" diked area OR on spill pallets?			
1D10. Are spill pallets/ diking in good condition and free from damage?			
1D11. No signs of spills or leaks on floor near Universal Waste?			
1D12. Sufficient aisle space in the area?			
1D13. Universal Waste segregated properly by type and compatibility?			

Any block checked 'NO', Complete Section 2

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COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY
ACT(CERCLA) STORAGE AREA INSPECTION CHECKLIST

Section 2: Non-Conforming Items Action List NOTE: IN THE EVENT OF A SPILL, CONSULT FBP-WM-PRO-00016, <i>SPILL CLEAN-UP AND REPACKAGING/TRANSFERRING WASTE</i>		
Item Number	Discrepancy Details	Actions Taken

Additional Comments (Inspector or Reviewer):

Checklist Reviewer (Name and Badge Number):

Date:

Print/Sign

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Attachment B
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT (CERCLA) WASTE STAGING AREA INSPECTION CHECKLIST



COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT (CERCLA) WASTE STAGING AREA INSPECTION CHECKLIST

Storage Location:	Date:
Inspector Name & Badge Number (Print/Sign):	

Containerized Waste: (If not present check N/A)	Yes	No	N/A
1. Container is in good condition.			
2. Container is labeled in accordance with WCD or procedure requirements.			
3. Area is posted as a CERCLA Waste Staging Area and waste type which may require additional signage on all approachable sides.			
4. Incompatible waste segregated with a physical barrier.			
5. If required, secondary container requirements for the WCD or procedure are met			
6. Is secondary containment in good condition and free from damage?			
7. Waste start dates are on container label(s).			
8. Adequate space for inspection			
9. Is there evidence of leaks, spills, or leakage into the area?			
10. Spill kit as appropriate (Liquids only, N/A if solid).			

* Any item marked NO, fill out section below:

Comments:

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Attachment C
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT (CERCLA) LOW LEVEL WASTE ACCUMULATION PILE
CHECKLIST



COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT (CERCLA) LOW LEVEL WASTE ACCUMULATION PILE
CHECKLIST

Storage Location:	Date:
Inspector Name:	
Inspector Badge Number:	
Inspector Signature:	

Non-Containerized Waste: (If not present check N/A)	Yes	No	N/A
1. Is the area posted as a CERCLA Low Level Waste pile on all approachable sides?			
2. If waste has a WMG label, is the start date on the label?			
3. Is there any evidence of hazardous waste having been added to the area?			
4. Is there any evidence of water, oil, or other liquid entering the area?			
5. Verify all material is within the LLW area boundary.			
6. Is there adequate space for inspection?			

* Any item marked NO, fill out section below:

Comments:

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Attachment D
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT (CERCLA) BULK WASTE ACCUMULATION AREA CHECKLIST



COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT
(CERCLA) BULK WASTE ACCUMULATION AREA CHECKLIST

Storage Location:	Date:
Inspector Name:	
Inspector Badge Number:	
Inspector Signature:	

Non-Containerized Waste: (If not present check N/A)	Yes	No	N/A
1. Is the area posted as a Bulk Accumulation Area on all approachable sides?			
2. Is the material within the designated area?			
3. Is the area free of non-conforming items? (examples: light bulbs, batteries, circuit boards, electronic scrap, containerized waste, asbestos, or other suspect materials)			
4. Is the area free of spills or leaks?			

* Any item marked NO, fill out section below:

Comments:

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Attachment E
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY
ACT (CERCLA) COMPACTED BUNDLE CONTAINER STORAGE CHECKLIST



COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT (CERCLA) COMPACTED BUNDLE CONTAINER STORAGE CHECKLIST

Inspection Items:	Yes	No
1. A minimum of 5 feet of space exists between each container.		
2. The integrity of the container not compromised: a. There are no visible holes b. Dents, if present, are no more than ½ inch in depth and are not longer than 6 inches c. Surface rust, if present, does not covering more than a 1 foot x 1 foot area.		
3. Each container has the following labels: a. Waste Tracking System Barcode and Number (WMG Label) b. Waste Information Label (complete with LLW and Waste Description) c. Green CERCLA Label d. Fissile or Fissile Exempt Label		
4. All container labels and writing are legible.		
5. Containers are stored only 2 high or less.		
6. Each container has an intact TID.		
7. Each container is welded shut, and the weld shows no sign of deterioration.		
8. The walkways between the containers are free from obstructions, trash, or debris.		
9. Each container is stored in a dry location: a. No standing water b. No depression that could hold water during a rain event		
10. There are no signs of berm deterioration in the storage facility: a. No cracks, pieces missing, excessive pitting, holes larger than 1 inch, or separation of the berm from the ground surface		

Provide detailed and concise information on any inspection item marked as "No".

Inspection Completed By: _____ Date: _____

Inspection Reviewed By: _____ Date: _____

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Attachment G
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT (CERCLA) CONTAINERIZED LOW LEVEL WASTE (LLW)
CHECKLIST



Comprehensive Environmental Response, Compensation, and
Liability Act (CERCLA) Containerized Low-Level Waste (LLW) Checklist

Location:	Date:
Inspected By:	Time:

Inspection Items	Yes	No	N/A
Are container lids closed & secured?			
Do the containers seem to be in good condition (Free from rust and dents)?			
Are there signs of bulging or deformation that may indicate the container is pressurized?			
Are the contents marked or labeled on the container?			
Is there adequate spacing to allow inspections?			
Are liquids spilled on the floor or work surfaces?			
Spill kit as appropriate (Liquids only. N/A if solid)			

Comments:
Discrepancies:
Corrective Actions:

Inspected by: _____ **Badge #:** _____

Reviewed by: _____ **Date:** _____